

LAW OFFICE OF SANDRA D. PARKER  
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New York, NY 10022  
(212) 317-2883  
Sandra D. Parker  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MAUVAREEN BEVERLEY,

Plaintiff,

-against-

18 CV 08486 (ER)(JW)

NEW YORK CITY HEALTH AND  
HOSPITALS CORP., MITCHELL  
KATZ, Individually and as Chief Operating  
Officer and President of New York City Health  
and Hospitals Corp., STANLEY BREZENOFF,  
Individually and as Interim Chief Operating  
Officer and President of New York City Health  
and Hospitals Corp., PLACHIKKAT V.  
ANANTHARAM, Individually and as Chief  
Financial Officer of New York City Health and  
Hospitals Corp.,

Defendants.

-----X  
DECLARATION IN SUPPORT OF  
EMERGENCY MOTION TO WITHDRAW  
AS PLAINTIFF'S COUNSEL

SANDRA D. PARKER, pursuant to 28 U.S.C. § 1746 and subject to the penalties

of perjury, states as follows:

1. I am a member of the Law Office of Sandra D. Parker and the attorney of record for the Plaintiff in the above entitled action.

2. I am fully familiar with the facts stated herein, based on knowledge gained from prosecuting this action.

3. I make and submit this declaration in support of the motion, made pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for Sandra D. Parker and the Law Office of Sandra D. Parker to withdraw as attorney of record for Mauvareen Beverley, the Plaintiff in the above entitled action.

4. We assert a retaining lien of \$3,573.15.

5. This is an emergency motion in that discovery has concluded in this case and by June 15, 2025 the parties are to inform the Court as to the case status, including whether any dispositive motions will be filed.

6. Plaintiff anticipates that Defendants will be filing a motion for summary judgment.

7. The issue of Plaintiff's representation should be addressed in sufficient time to permit Plaintiff to provide the Court with a status of the case and to take steps to address Defendants' anticipated motion for summary judgment.

8. We seek to withdraw from representing the Plaintiff, pursuant of Rule 1.16

(c) of the Rules of Professional Conduct, NY ST RPC Rule 1.16, because Plaintiff is unwilling to fulfill her obligations under Rule 1.16(c) and otherwise renders the representation unreasonably difficult to carry out effectively.

9 Due to our obligations of confidentiality and fidelity to the Plaintiff, at this time, we cannot be more specific as to the reasons for the application to withdraw.

10. However, we respectfully request the opportunity to provide the Court *in camera*, with a detailed explanation of the reasons for this application to withdraw, and the Plaintiff's conduct which has resulted in this application.

11. For the foregoing reasons, we respectfully request that this application to withdraw as attorney for the Plaintiff be granted.

Dated: New York, New York  
May 8, 2025

/s/ Sandra D. Parker